

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**SNL WORKFORCE FREEDOM
ALLIANCE, *et al.*,**

Plaintiffs,

v.

**NATIONAL TECHNOLOGY AND
ENGINEERING SOLUTIONS OF
SANDIA LLC d/b/a SANDIA NAT'L
LABORATORIES, *et al.*,**

Defendants.

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Case No. 1:22-cv-00001-KWR-SCY

**DECLARATION OF BRADLEY
DICKERSON IN SUPPORT OF
NATIONAL TECHNOLOGY AND
ENGINEERING SOLUTIONS OF
SANDIA, LLC'S OPPOSITION TO
MOTION FOR TEMPORARY
RESTRAINING ORDER**

DECLARATION OF JOHN BRADLEY DICKERSON

I, John Bradley Dickerson, hereby declare:

1. I am the Senior Manager of Global Chemical and Biological Security at National Technology and Engineering Solutions of Sandia, LLC ("NTESS"). I have held this position since May 2018. In addition, since May 2021, I have served as the Pandemic Coordinator and led the Pandemic Team at NTESS. I make this declaration in support of NTESS's Opposition to Plaintiffs' Motion for Temporary Restraining Order. The facts set forth in this declaration I know to be true of my own personal knowledge and upon information and belief. If called to testify in this matter, I could and would competently testify to the matters set forth in this declaration.

2. Since early 2020, NTESS responded proactively to the pandemic, implementing a pandemic plan to protect workers and ensure the continuation of mission critical operations. While NTESS initiated a maximum telework policy, mask wearing and social distancing policies, many of

its employees were required to remain on site due to national security mission activities and national priority work. Consequently, NTESS stood up a COVID-19 testing location on site.

3. I understand that the Plaintiffs in this lawsuit contend that New Mexico authorized NTESS to administer vaccines. That is a bit misleading.

4. In 2020, NTESS sought and received authorization from the Centers for Disease Control (CDC) to administer COVID-19 vaccines. In accordance with CDC direction, NTESS, like countless New Mexico-based private pharmacies, medical clinics, and other private healthcare organizations, then had to enter into an agreement with the New Mexico Department of Health as a COVID-19 vaccinator by submitting a copy of its CDC COVID-19 Vaccination Program Provider Agreement to the COVID-19 Provider Location Portal. See <https://www.cdc.gov/vaccines/covid-19/provider-enrollment.html>. The New Mexico Department of Health approved NTESS/SNL to participate in the CDC Covid-19 Vaccination Program. The reason NTESS needed to submit paperwork to New Mexico to administer vaccines is because the federal government distributes vaccines by first doling them out to the states that, in turn, dole out vaccine doses to CDC-authorized medical providers.

5. NTESS developed its own registration process for administering the vaccines, which might involve patients declaring whether they were in any priority groups identified by the state – such as being 70+ or having a medical condition that made them high risk for COVID complications.

6. NTESS instituted a vaccination requirement for its own employees because as a federal contractor it was required to do so by President Biden's Executive Order 14042. NTESS implemented its vaccine requirement without any direction, input, or guidance from the State of New Mexico or any other state. NTESS neither sought nor received direction from the State of New Mexico or any other state on its internal vaccine policy. NTESS developed its own

vaccination strategy and outreach for vaccinating its employees and contractors. Further, NTESS received no state funding for its vaccination program.

7. I understand the Plaintiffs in this lawsuit contend that NTESS used SafeGraph to conduct contract tracing at SNL. This is not true.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on Jan 13, 2022.


John Bradley Dickerson